

Pierce County Comments on Fact Sheet

Department of Ecology
Water Quality Program
MAY 19 2006

Page 7, first Bullet-Human Health

It states that stormwater is not safe for people to drink. It is never recommended, that is why it is under the CWA, not the SDWA. Delete this statement.

Page 8, second bullet—Drinking Water

It should be noted that stormwater has not yet contaminated the deep aquifers that water for 2/3 of the County comes from, even after 150 years. Eliminate the reference to individual counties.

Page 8, table , Lead

Another source of lead is old smelter sites.

Table continues on page 9-

It is interesting that most of the items noted are anthropogenic. Is this a prejudice? Please add:

Arsenic—Volcanoes

Bacterial/Viral Agents—wild animals

Oil and Grease—Use of petroleum based dust palliatives, which are unregulated in Washington State

Nutrients—Wild animals

Page 10, first paragraph

In this discussion of characterization data it states that “The rainfall patterns and land cover characteristics in Oregon are sufficiently similar to Washington to provide an indication of the general quality of stormwater discharges in Washington”. That pretty much indicates that doing any more characterization of outfalls, as is suggested in the Monitoring section of the draft permit, is not necessary.

Page 15, 4th bullet

Talks about the watershed approach as encouraged. This is needed for the entire Puget Sound Basin, and tools such as pollutant trading should be included.

Page 18, first paragraph

This is part of the Federal Register, and discussed a municipalitie’s obligation to control stormwater discharges from industrial activity. Here’s a no brainer, how about Ecology send us copies of every permit they issue to industries in our municipality, and even involve us in the approval process up front. This does not happen, and we struggle just to get Ecology to send us a list of all the NPDES permits issued in our County. There must be a better way to coordinate this, and have Ecology live up to their own obligations before trying to pass them on to us.

Page 24, discussion of toxicants

This is for Wastewater, not Stormwater, throw it out.

Page 36, 2nd paragraph

Any reference to the municipalities enforcing on drinking water conservation should be removed. This is the CWA, not the SDWA.

Page 37, paragraphs 1 and 2

Both of these mention the draft Tri-County stormwater proposal, and draw timeframes from it. The proposal was never adopted, for a variety of reasons, and should not be used for justification.

Page 51 and 52-List of parameters

This is a large list, and was not spelled out in the draft permit. For any permit requirement, it should be completely spelled out in the permit for monitoring constituents.

Appendix C-Monitoring costs

Your estimates are very low. Most of the municipalities are submitting cost estimates for this, including Pierce County.